

Jaime Dole

From: Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>
Sent: Tuesday, May 16, 2023 5:33 PM
To: John Cusick; Jaime Dole; Singleton, Natane (CRT); Natasha Merle
Cc: John Hooks; jcompton@witherspooncompton.com; Dayle Chung
Subject: RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

Jaime,

The United States does not oppose the District's motion.

All the best,
Aria

Aria S. Vaughan (*she/her*)
Senior Trial Attorney
U.S. Department of Justice, Civil Rights Division
Educational Opportunities Section
4 Constitution Square
150 M Street, NE | Suite 10.1117
Washington, DC 20002
iPhone: (202) 598-9629 | Fax: (202) 514-8337
aria.vaughan@usdoj.gov

This email message contains confidential information intended only for the use of the individual or entity to whom it is addressed. It may also contain legally privileged information. If the reader of this message is not the intended recipient, you are notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, notify me by email and destroy all paper and electronic copies.

From: John Cusick <jcusick@naacpldf.org>
Sent: Tuesday, May 16, 2023 4:56 PM
To: Jaime Dole <Jaime.Dole@arlaw.com>; Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>
Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com; Dayle Chung <dchung@naacpldf.org>
Subject: [EXTERNAL] RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

Thank you for the clarification, Jaime. We had not understood that to be Defendants' request. We will consider this request but will need some time to discuss it further.

From: Jaime Dole <Jaime.Dole@arlaw.com>
Sent: Tuesday, May 16, 2023 12:50 PM
To: John Cusick <jcusick@naacpldf.org>; Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>
Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com; Dayle Chung <dchung@naacpldf.org>
Subject: RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

[Caution: EXTERNAL EMAIL]

Hello John,

We had hoped in light of the District's plan to reopen Carver as an elementary school under the elementary reconfiguration, the LDF would withdraw its objection to the pending motion for modification related to the middle schools in which case an agreed order could be presented to Judge Wingate regarding both motions for modification. Please let us know your thoughts.

Kind regards,

Jaime

From: John Cusick <jcusick@naacpldf.org>

Sent: Tuesday, May 16, 2023 11:45 AM

To: Jaime Dole <Jaime.Dole@arlaw.com>; Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>

Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com; Dayle Chung <dchung@naacpldf.org>; John Cusick <jcusick@naacpldf.org>

Subject: RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

Afternoon Jaime,

I hope you're doing well.

We appreciate the information that you have shared. As we have discussed, resolving the initial modification motion (ECF 167) is necessary for Private Plaintiffs' assessment of the proposed second modification motion. So Private Plaintiffs will wait for the Court's decision on the initial modification motion.

Many thanks,
John

From: Jaime Dole <Jaime.Dole@arlaw.com>

Sent: Monday, May 15, 2023 3:07 PM

To: Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>; John Cusick <jcusick@naacpldf.org>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>

Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com; Dayle Chung <dchung@naacpldf.org>

Subject: RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

[Caution: EXTERNAL EMAIL]

Hello Natane,

I have attached the referenced map, and we will make that change in Paragraph 7.

Thank you,

Jaime

From: Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>

Sent: Monday, May 15, 2023 2:04 PM

To: Jaime Dole <Jaime.Dole@arlaw.com>; John Cusick <jcusick@naacpldf.org>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>

Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com; Dayle Chung <dchung@naacpldf.org>
Subject: RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

Thank you, Jaime. Would you mind providing a copy of the reconfigured attendance zone map (Exhibit 1)? Also, we think the District may have meant to write "Parties" instead of "Court" in the last sentence of Paragraph 7 that refers to submitting bi-annual reports.

Best,

Natane

Natane Singleton (*she/her*)
Senior Trial Attorney
U.S. Department of Justice
Civil Rights Division
Educational Opportunities Section
(202) 598-9619

This email message contains confidential information intended only for the use of the individual or entity to whom it is addressed. It may also contain legally privileged information. If the reader of this message is not the intended recipient, you are notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, notify me by email and destroy all paper and electronic copies.

From: Jaime Dole <Jaime.Dole@arlaw.com>
Sent: Monday, May 15, 2023 1:03 PM
To: Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>; John Cusick <jcusick@naacpldf.org>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>
Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com; Dayle Chung <dchung@naacpldf.org>
Subject: [EXTERNAL] RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300
Importance: High

Hello All,

We hope everyone is well. I have attached our proposed motion to modify the District's desegregation plan related to the elementary reconfiguration adopted by the Board. We would appreciate the parties advising whether the motion is opposed or unopposed. Ideally, we would like to file this ahead of our status conference on Wednesday; however, at the least we would like to be able to advise the Court that the motion is forthcoming and what the DOJ's and LDF's positions are.

Please let us know if you have any questions. We look forward to hearing from you all.

Kind regards,

Jaime

From: Jaime Dole <Jaime.Dole@arlaw.com>
Sent: Monday, April 17, 2023 2:10 PM
To: Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>; John Cusick <jcusick@naacpldf.org>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>
Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com; Dayle Chung <dchung@naacpldf.org>
Subject: RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

Good Afternoon Counsel:

Thank you to everyone for participating in the call last week. I am attaching the revised map showing the proposed elementary zone changes. The Carver Elementary zone is outlined in BOLD black. There are additional notes at the bottom of the map.

As requested, the District has provided elementary enrollment data from 2019-2020 to present:

	2019-20	2020-21	2021-22	2022-23
Crestwood	312	302	282	259
Oakland Heights	412	367	340	328
Parkview	404	369	419	408
Poplar Springs	504	447	431	412
Harris	517	483	483	434
West Hills	520	494	474	478
TOTAL	2669	2462	2429	2319

Please let us know if you have any questions. We anticipate circulating a draft motion for modification shortly.

Kind regards,

Jaime

From: Jaime Dole <Jaime.Dole@arlaw.com>

Sent: Wednesday, April 5, 2023 1:01 PM

To: Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>; John Cusick <jcusick@naacpldf.org>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>

Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com; Dayle Chung <dchung@naacpldf.org>

Subject: RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

Thanks everyone. Let's schedule a call for 2:30 EST/1:30 Central on April 13. I will send a calendar invitation.

From: Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>

Sent: Wednesday, April 5, 2023 12:55 PM

To: John Cusick <jcusick@naacpldf.org>; Jaime Dole <Jaime.Dole@arlaw.com>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>

Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com; Dayle Chung <dchung@naacpldf.org>

Subject: RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

Hi everyone,

DOJ takes no position on LDF's motion for status conference. As for scheduling a meeting next week, we are available until 3:30 p.m. EST on the 13th and any time before 2:00 p.m. EST on the 14th.

Thanks so much,

Natane

Natane Singleton (*she/her*)

Senior Trial Attorney

U.S. Department of Justice

Civil Rights Division
Educational Opportunities Section
(202) 598-9619

This email message contains confidential information intended only for the use of the individual or entity to whom it is addressed. It may also contain legally privileged information. If the reader of this message is not the intended recipient, you are notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, notify me by email and destroy all paper and electronic copies.

From: John Cusick <jcusick@naacpldf.org>
Sent: Wednesday, April 5, 2023 1:00 PM
To: Jaime Dole <Jaime.Dole@arlaw.com>; Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>
Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com; Dayle Chung <dchung@naacpldf.org>
Subject: [EXTERNAL] RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

Thanks for letting us know the District's position about the motion, Jaime. Natane, will DOJ have a chance to weigh in today before we file later this afternoon?

For scheduling, LDF is free after 2:00 p.m. EST on April 13. We could also make before 2:00 p.m. on EST on April 14, but we'd prefer April 13.

Many thanks,
John

From: Jaime Dole <Jaime.Dole@arlaw.com>
Sent: Wednesday, April 5, 2023 11:57 AM
To: John Cusick <jcusick@naacpldf.org>; Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>
Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com
Subject: RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

[Caution: EXTERNAL EMAIL]

Hello Counsel,

The District does not oppose the motion for status conference.

Dr. Carter and Mr. Compton are unavailable April 11 and 12. Would April 13 or 14 work for the DOJ and LDF?

Thank you,

Jaime

From: Jaime Dole
Sent: Wednesday, April 5, 2023 7:55 AM
To: John Cusick <jcusick@naacpldf.org>; Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>
Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com
Subject: RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

Good Morning John,

We will discuss joining / not opposing the motion for status conference and let you know our position today. The District would like to know if, in light of its plan to place students back at Carver, the LDF continues to oppose the pending motion for modification?

I will ask Dr. Carter if there is additional information she can provide about the reasons for the proposed elementary reconfiguration. I know the District is working on a map with the proposed new elementary zones. We hope to have that shortly.

John Hooks is not available on 4/11/23, but he is on 4/12. Let me check with Dr. Carter and John Compton on their availability and circle back to you.

Kind regards,

Jaime

From: John Cusick <jcusick@naacpldf.org>

Sent: Tuesday, April 4, 2023 11:50 AM

To: Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>; Jaime Dole <Jaime.Dole@arlaw.com>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>

Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com; John Cusick <jcusick@naacpldf.org>

Subject: RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

Thank you, Jaime. Within DOJ's availability, LDF is available 4/11 any time except 2-3pm EST and 4/12 after 2:30pm EST.

We also appreciate you sharing the chart of current and projected enrollment by school and with racial demographic information. Could you also share updated attendance zones, in particular for the T.J. Harris and Oakland Heights students? Along the same lines, could you provide any additional details or information about the reasons that prompted the reconfiguration plan? Although Dr. Carter's letter to Judge Wingate and the PowerPoint you shared provide some context, sharing anything else before our meeting would aid that discussion and our assessments.

On a final note, we plan to ask the Court to hold a status conference regarding Defendants' initial motion to modify the desegregation plan tomorrow morning. Resolving that motion first would be helpful to assessing the motion you previewed, Jaime. We also think it's beneficial in that request to remind the Court of the pending joint request for settlement approval. Do Defendants and DOJ want to join, take no position, or oppose that request? And, of course, happy to consider any changes if it would aid a joint request, a draft of which is attached for ease of reference.

Sincerely,
John

From: Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>

Sent: Thursday, March 30, 2023 4:09 PM

To: Jaime Dole <Jaime.Dole@arlaw.com>; John Cusick <jcusick@naacpldf.org>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>

Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com

Subject: RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

[Caution: EXTERNAL EMAIL]

Thank you, Jaime. DOJ is generally available Monday through Wednesday of the next two weeks except 11:30-1:30 on Wednesdays.

Natane Singleton
Educational Opportunities Section
(202) 598-9619

From: Jaime Dole <Jaime.Dole@arlaw.com>
Sent: Thursday, March 23, 2023 1:35 PM
To: John Cusick <jcusick@naacpldf.org>; Natasha Merle <nmerle@naacpldf.org>; Vaughan, Aria (CRT) <Aria.Vaughan@usdoj.gov>; Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>
Cc: John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com
Subject: [EXTERNAL] FW: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

Dear Counsel,

The District would like to schedule a call to discuss the elementary reconfiguration plan approved by the Board on March 21, 2023. The District hosted a number of community meetings regarding the reconfiguration prior to the Board's vote. The support for the plan has been largely positive, including from the Carver Coalition. I have attached the current and projected enrollment under this proposal and a copy of the presentation the District prepared and used during the community meetings.

We would appreciate counsel providing your availability for the next couple of weeks.

As I mentioned in my email to the Court today, the District will be filing a formal motion to modify its desegregation plan to alter the elementary zone lines. The District is in the process of preparing a map of the new zones. We will be glad to share the revised map once it is ready.

Kind regards,

Jaime

Jaime Dole | [ADAMS AND REESE LLP](#)

Paralegal

1018 Highland Colony Parkway, Suite 800 | Ridgeland, MS 39157

P: 601.292.0773

Jaime.Dole@arlaw.com | [Twitter](#) | [LinkedIn](#)

From: Jaime Dole
Sent: Thursday, March 23, 2023 12:26 PM
To: 'John Cusick' <jcusick@naacpldf.org>; 'wingate_chambers@mssd.uscourts.gov' <wingate_chambers@mssd.uscourts.gov>; 'Carmen Castilla' <Carmen.Castilla@mssd.uscourts.gov>; 'Terri Barnes' <Terri.Barnes@mssd.uscourts.gov>
Cc: 'Natasha Merle' <nmerle@naacpldf.org>; 'John Hooks' <John.Hooks@arlaw.com>; 'jcompton@witherspooncompton.com' <jcompton@witherspooncompton.com>; 'Aria Vaughan' <Aria.Vaughan@usdoj.gov>; 'Singleton, Natane (CRT)' <Natane.Singleton@usdoj.gov>
Subject: RE: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

Dear Judge Wingate,

Please see the attached letter from Superintendent Dr. Amy Carter regarding the School Board's recent vote to approve an elementary reconfiguration plan. The District will be presenting a formal motion to modify the desegregation plan, but we wanted to go ahead and give the Court and parties notice in advance.

Kind regards,

Jaime

From: John Cusick <jcusick@naacpldf.org>

Sent: Tuesday, March 7, 2023 8:39 AM

To: wingate_chambers@mssd.uscourts.gov; Carmen Castilla <Carmen_Castilla@mssd.uscourts.gov>; Terri Barnes <Terri_Barnes@mssd.uscourts.gov>

Cc: Natasha Merle <nmerle@naacpldf.org>; John Hooks <John.Hooks@arlaw.com>; jcompton@witherspooncompton.com; Aria Vaughan <Aria.Vaughan@usdoj.gov>; Singleton, Natane (CRT) <Natane.Singleton@usdoj.gov>; Jaime Dole <Jaime.Dole@arlaw.com>; John Cusick <jcusick@naacpldf.org>

Subject: Barnhardt, et al. v. Meridian Public School District, Case No. 4:65cv1300

Dear Judge Wingate,

Private Plaintiffs write to follow up regarding the Defendants' motion to modify the desegregation plan (ECF Nos. 167 and 173), which Private Plaintiffs opposed (ECF No. 170). The Court held an evidentiary hearing on whether Defendants were permitted to close Carver Middle School, which included witness testimony and argument, on August 11, 2022.

We appreciate the Court's attention to this matter.

Sincerely
John

John S. Cusick (he/him)
Assistant Counsel



40 Rector Street, 5th Floor, New York, NY 10006
c: [917.858.2870](tel:917.858.2870) | jcusick@naacpldf.org | tw: [@johnscusick](https://twitter.com/johnscusick)
naacpldf.org

PRIVILEGE AND CONFIDENTIALITY NOTICE: This email and any attachments may contain privileged or confidential information and is/are for the sole use of the intended recipient(s). Any unauthorized use or disclosure of this communication is prohibited. If you believe that you have received this email in error, please notify the sender immediately and delete it from your system.